

Exhibit B

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TERRY WAYNE HUGHES,

Plaintiff,

v.

4:17-cv-03451

NATIONAL CREDIT ADJUSTERS, L.L.C.,

Defendant.

AFFIDAVIT OF NATHAN VOLHEIM

I, NATHAN VOLHEIM, being first duly sworn upon oath, depose and say that I submit this Affidavit in support of Plaintiff's Motion for Turnover Order. I have personal knowledge and thereby testify to the below facts. The facts set forth in the affidavit are known to me to be true based upon my personal knowledge of such facts. If called upon to testify as a witness, I would so testify to these facts.

1. I am an attorney licensed to practice law in the State of Illinois as well as federal district courts throughout the country, including the Southern District of Texas.
2. I am employed by Sulaiman Law Group, Ltd. ("Sulaiman") and am counsel of record for Melody Charmaine Whitsett ("Plaintiff") in the above captioned civil matter.
3. Through my employment at Sulaiman, I have served as plaintiff's counsel in prior cases involving my clients and the instant defendant, National Credit Adjusters, LLC ("Defendant").
4. One such case was: *Whitsett v. National Credit Adjusters, L.L.C.*, No. 1:17-cv-05845 (N.D. Ill.).

5. The above referenced case resolved by virtue of a mutually agreed upon settlement, notice of which was filed with the Northern District of Illinois on December 7, 2017.

6. After receiving the settlement funds from Defendant pursuant to the above referenced civil matter, it was discovered that Defendant utilizes Central Bank & Trust, Co., PO Box 1366, Hutchinson, Kansas, as its financial institution.

7. Further, after the instant lawsuit was filed, Defendant had contacted Plaintiff, through counsel, and had asked for a settlement demand.

8. This information, when taken together, suggests that Defendant remains a viable entity with sufficient assets being held with Central Bank & Trust, Co. such that those funds could be executed upon and be utilized in satisfaction of Plaintiff's Default Judgment entered against Defendant.

FURTHER AFFIANT SAYETH NOT:

s/ Nathan C. Volheim
Nathan C. Volheim

SWORN TO AND SUBSCRIBED before me this 6th day of April, 2018.

Kiran Wadia
Notary

My commission expires November 15, 2020.

